



EX PARTE OR Docket

**ORIGINAL**

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March 1, 1996

**EX PARTE**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, DC 20554

RECEIVED  
MAR - 1 1996  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY  
DOCKET FILE COPY ORIGINAL

RE: Interconnection Between Local Exchange Carriers and Commercial  
Mobile Radio Service Providers (CC Docket No. 95-185).

Dear Mr. Caton:

On Thursday, February 29, 1996, Greg Tedesco, Paula Jordon, and I, on behalf of AirTouch Communications, met with Rudy Baca, Legal Advisor to Commissioner Quello to discuss issues relating to this proceeding. The attached material was distributed. Please associate this material with the above-referenced proceeding.

Two copies of this notice are being submitted to the Secretary in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me at 202-293-4960 should you have any questions or require additional information concerning this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Q. Abernathy", is written over a circular stamp.  
**Kathleen Q. Abernathy**

Attachment

cc: Rudy Baca

No. of Copies rec'd CH 1  
List ABCDE



# Cellular Interconnection

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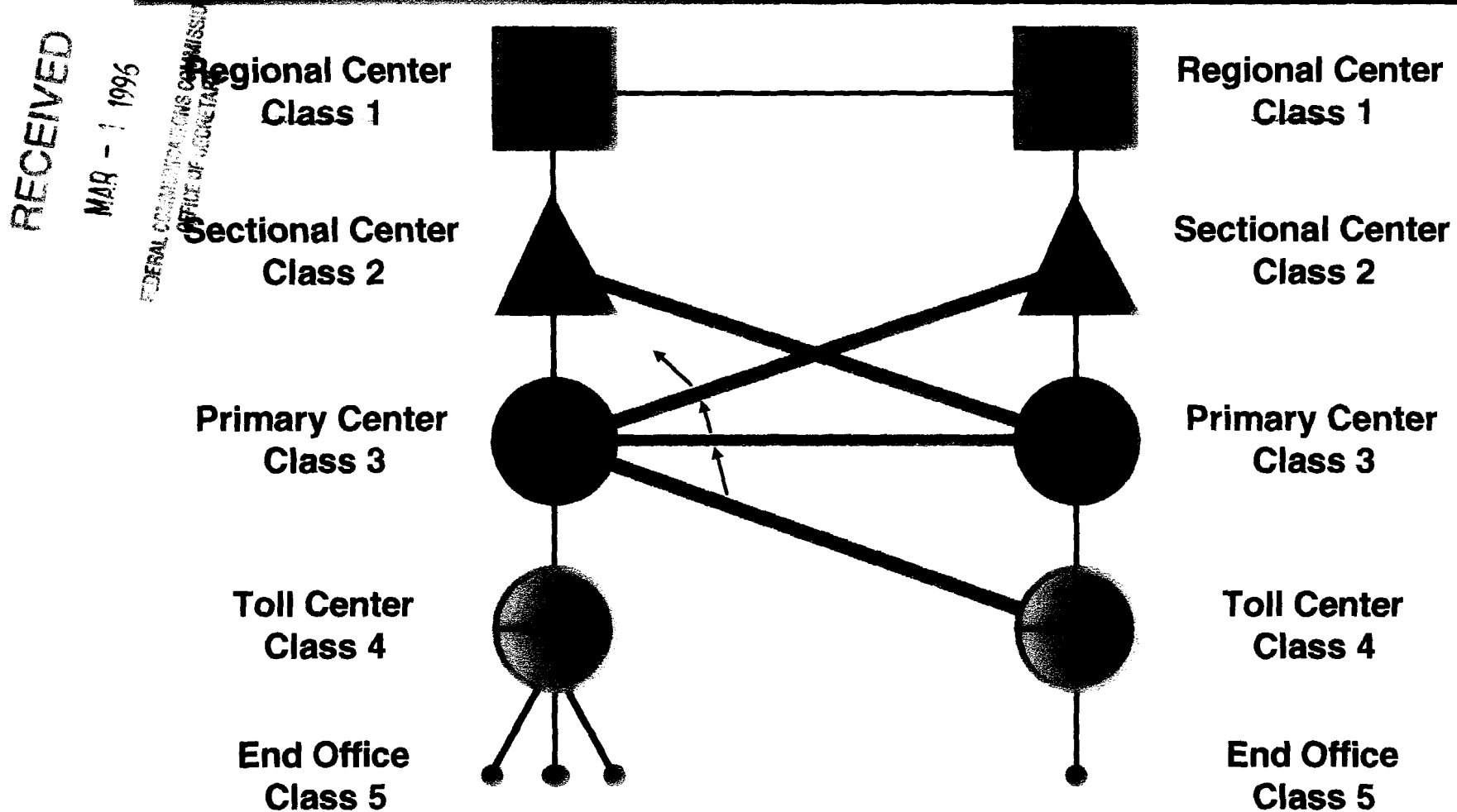
**Greg Tedesco**

*Manager, Interconnect & Numbering Programs*

*Wireless Engineering & Operations Department*

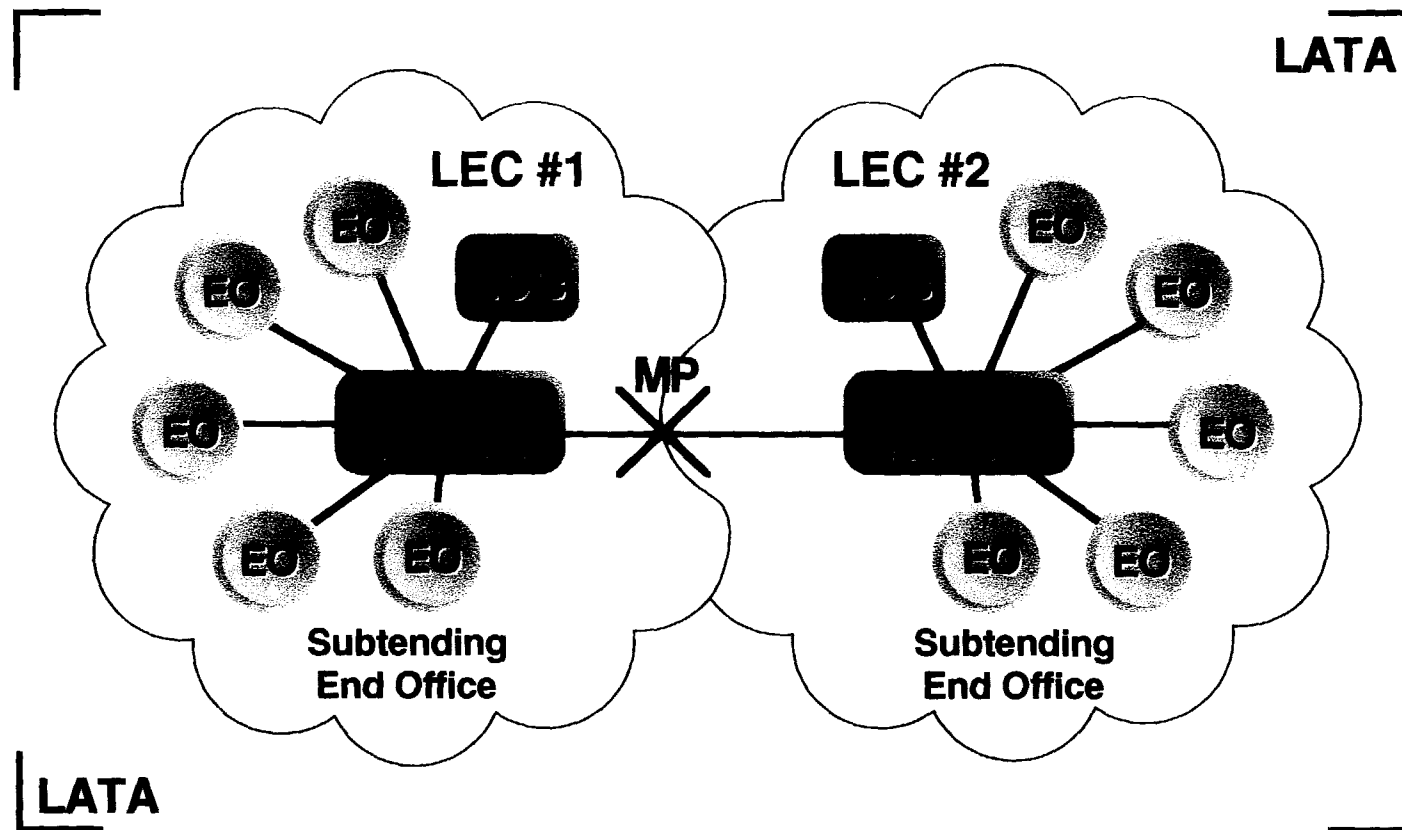
*February 29, 1996*

# The Pre-Divestiture Network...



...Did Not Account For Competition

# Public Switched Telephone Network (PSTN)

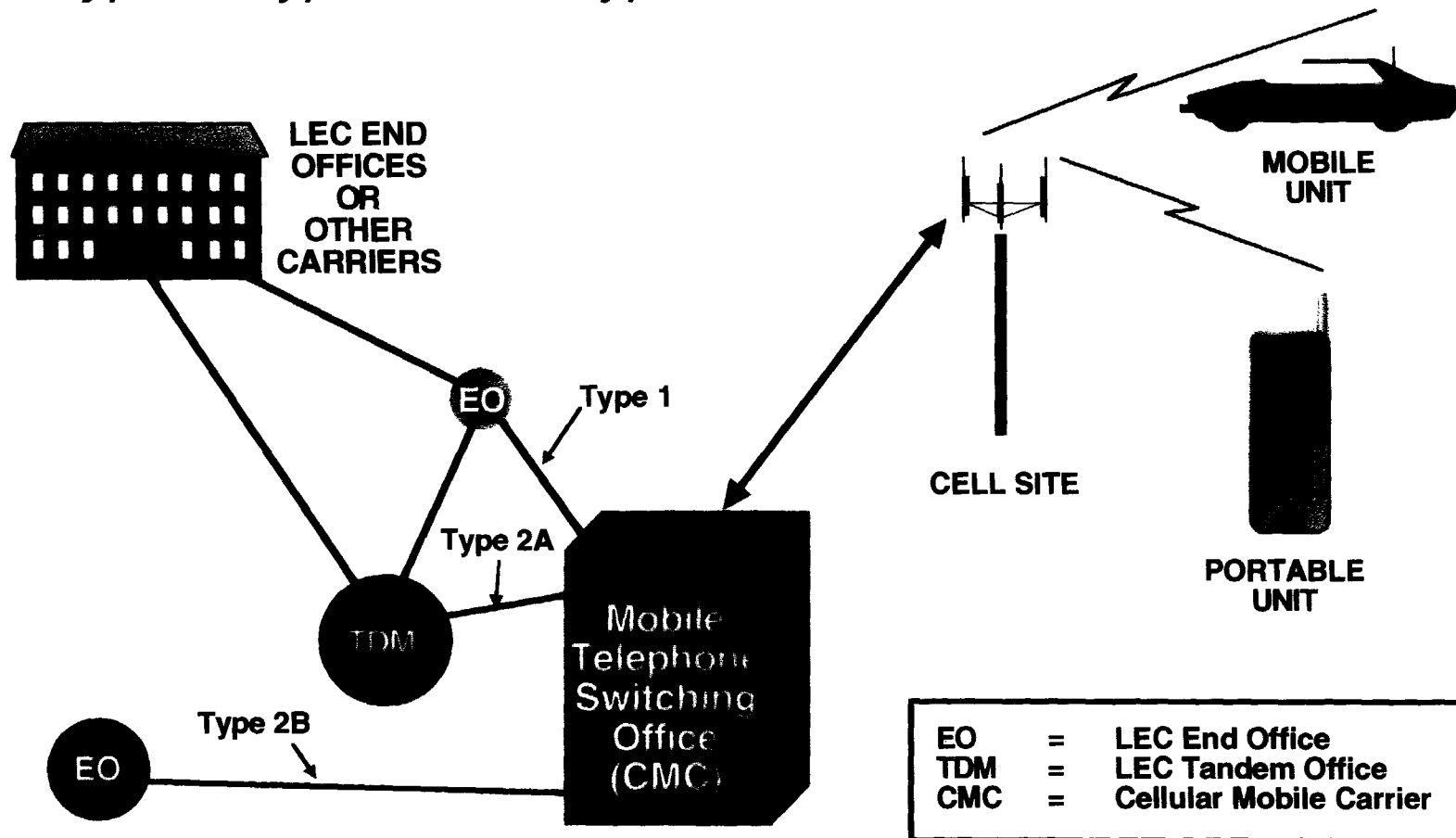


**LEGEND:**

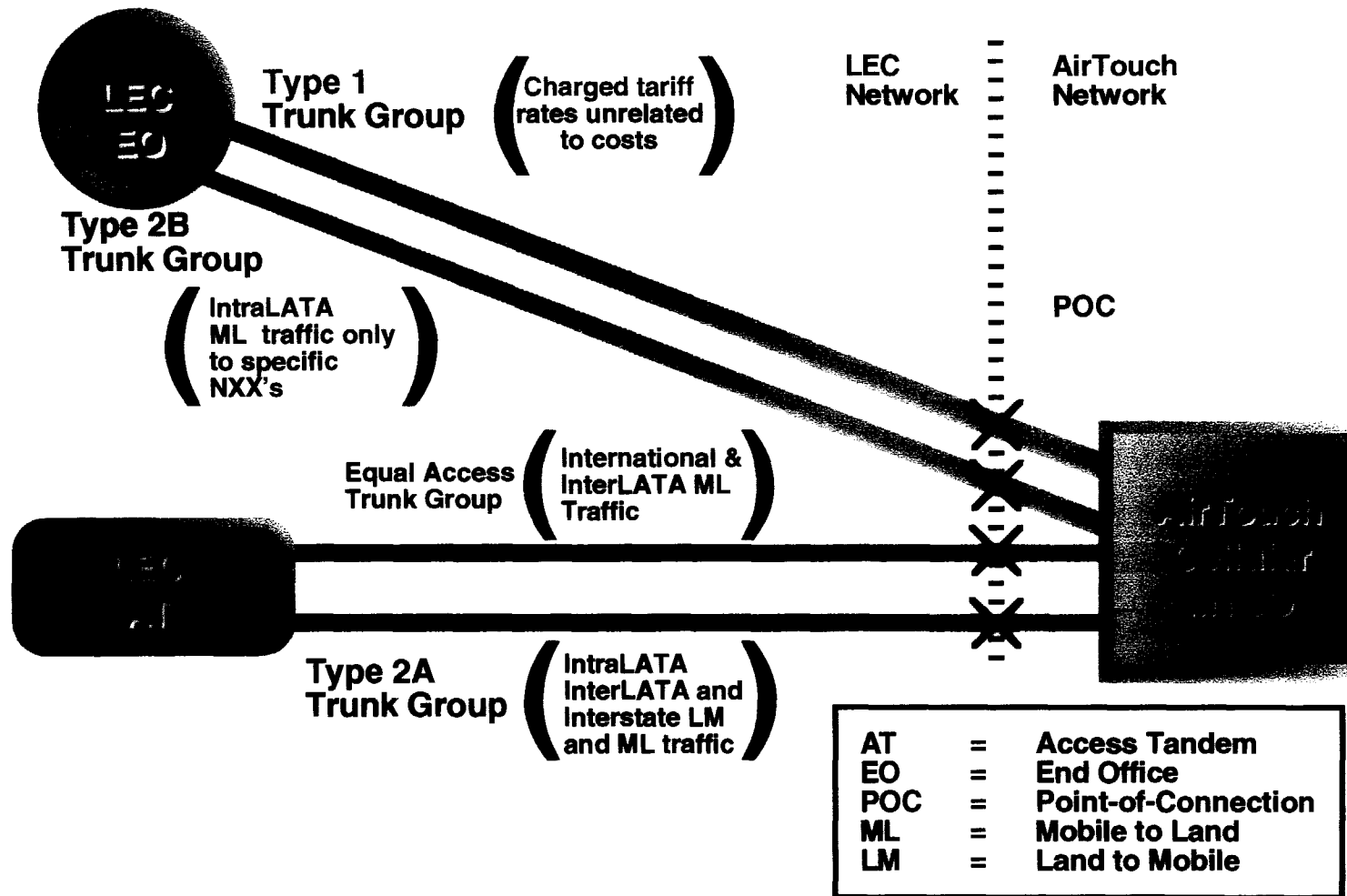
EO	=	End Office
IC	=	InterLATA Carrier
MP	=	Meet Point
LEC	=	Local Exchange Carrier

# Cellular Mobile Carrier to Local Exchange Carrier (LEC) Switched Interconnection Configurations

*Type 1, Type 2A and Type 2B*



# How Do We Interconnect Today



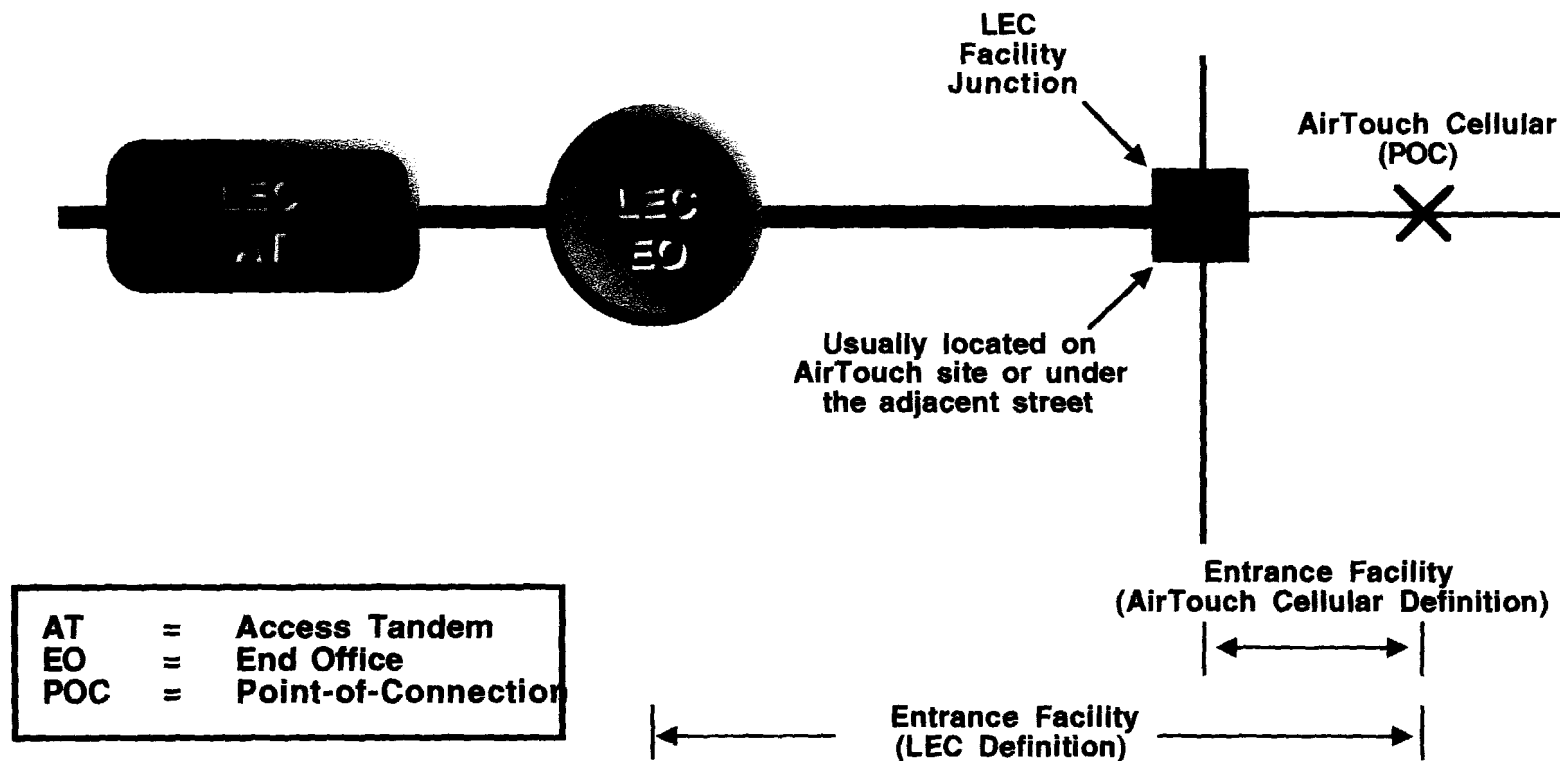
# “Entrance Facilities”

## LEC Definition

“All Facilities between AirTouch’s POC and LEC’s End Office”

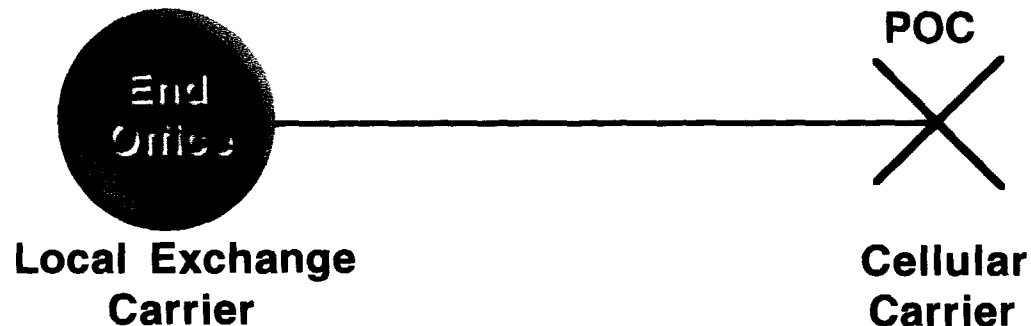
## AirTouch Cellular Definition

“All Nonreusable Facilities between AirTouch POC and LEC’s Nearest Facility Junction Point”



# Type 1 Connection

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- Originally Known as a TA-76 Connection
- Call Detail Recordings Made in the End Office (Only the AT&T 1AESS & 5ESS and NTI DMS100 & DMS200 can Record Call Details for ML Calls)
- Connections can be made to all NXX Codes in the LATA, Directory Assistance, Operator Services (0+, 0-), N11 Codes, Service Access Codes (800,900, etc.), InterLATA and International Carriers
- For InterLATA Calls the trunk group must be presubscribed to a Primary InterLATA Carrier (PIC); Other interLATA carriers may be accessed via 10XXX dialing



# **Type 1 Connection Contract Arrangements**

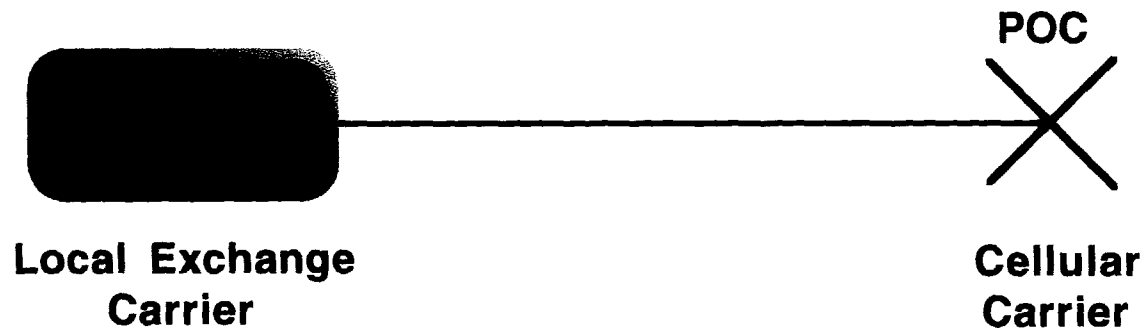
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- **AirTouch designates one or more POC's**
- **AirTouch leases TI Facilities**
- **AirTouch pays ML local, intraLATA, ZUM & Toll Charges**
- **AirTouch pays ML InterLATA charges**
- **AirTouch pays for each NXX Code (First NXX in each area code is free)**
- **AirTouch can purchase shared NXX blocks of 100 numbers**
- **LEC provides toll billing exception (TBE) and Selective-Class-of-Call Screening (SCCS)**

***Wireless Carriers have always been treated like an exchange (i.e. PBX) customer and not a co-carrier at the end office***

# Type 2A Connection

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- Full trunk-side connection; MTSO looks like an EO
- Some access tandems can provide call recording; some access tandems relay upon the EO's
- Connections can be made to all NXX codes in subtending EO's; some LEC's will use Inter-tandem trunking to access EO's subtending other access tandems
- Connections can be made to InterLATA and International carriers; selection of InterLATA carriers is based upon 10XXX outputting for each call

# Type 2A Contract Arrangements

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- **AirTouch pays ML minutes-of-use charge for IntraLATA calls**
  - ⌘ Rate elements based on Intrastate, Interexchange Access (Local transport, Local Switching, Line Termination, Intercept)
- **AirTouch designates one or more POCs**
  - ⌘ An effort for AirTouch to cut cost because of distance sensitive fixed facility costs and special construction.
- **IntraLATA and InterLATA LM calls are carried on the IntraLATA trunk group**
  - ⌘ Although the trunk group is priced primarily as an IntraLATA trunk group, it does carry InterLATA traffic
- **AirTouch pays nothing for InterLATA calls; the mobile customer pays interLATA charges directly to the InterLATA carrier**
  - ⌘ No access rates charged to AirTouch on these ML calls using interLATA carrier
- **Charging for LM calls can be handled in one of three ways:**
  - ⌘ MTS (Type 1)
  - ⌘ LM1 (Type 1 at the tandem)
  - ⌘ LM2 (Type 2)

***Per minute charges are driven from local exchange MTS  
Tariff elements and are not appropriate for co-carriers***

# **Rational and Nondiscriminatory Approach to Interconnect**

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## **■ Interconnection costs**

- Must be treated like a co-carrier
- Bill and keep (meet point billing) promotes technically efficient interconnection and is how LECs interconnect today

## **■ Points of connection**

- Routing to nearest AirTouch POC
- Special construction charges for entrance facilities